

Main Identity

From: "Chris Duncan" <chris@holladayengineering.com>
To: "Jim Rush" <jrush@rockymountainenvironmental.com>
Sent: Friday, September 29, 2006 3:37 PM
Subject: Re:Draft Rules

Jim,

I had a few informal comments to make about the current draft rules. I can submit these comments to IDWR after discussing them with you, if needed.

- 1) Line 163 - lists "Type I, II, and III cement", but Line 460 only lists "Type II and Type III cement". Is this correct? Is Type I cement acceptable? I was confused.
- 2) Line 1015 - lists "sand and silt", but it may be better to replace with unconsolidated sedimentary unit(s).
- 3) Line 1048 - lists "shall estimate". A suggested replacement is "shall test".
- 4) Line 1051 and 1052 (i) - I suggest listing testing methods. It could read "May use a bail-test, slug test, air lift test, constant rate pump test or step-rate pump test and recovery information with a minimum test duration of 1-hour to provide data to determine specific capacity or sustained yield of the well."
- 5) Line 1054 and 1055 (ii) - I suggest replacing the wording with "Shall record on Well Driller's report the well test method, rate of discharge or slug volume, static water level prior to test, water level change per elapsed test time, water level recovery per elapsed test time and calculated specific capacity(s) in gpm/ft of drawdown".

This wording is rough, but my idea is to require test data, so anyone can review the information and form an interpretation. The most important information from any type of well test is drawdown and recovery per unit of time and pumping rate (hopefully at a near constant pumping rate). It's important to ask for recovery data to understand the strength of an aquifer. I find in situations, such as mountain locations, the sustained yield from the aquifer is too low to support a house (i.e., pumping looks great, but has very poor recovery). It could be a good situation for a driller, recommending value added items such as storage to meet the water demands. I know this may be a long-shot suggestion. Hopefully, you or some else has some additional ideas to improve this.

Thanks,

Chris D.

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